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# U.S. DEPARTMENT OF ENERGY OFFICE OF ENERGY EFFICIENCY AND RENEWABLE ENERGY NEPA DETERMINATION



RECIPIENT: Case Western Reserve University STATE: OH

PROJECT TITLE: Molten Salt Electrolysis for Sustainable Iron Metal Production

Funding Opportunity Announcement Number Procurement Instrument Number NEPA Control Number CID Number

DE-FOA-0002804 DE-EE0010846 GFO-0010846-001 GO10846

Based on my review of the information concerning the proposed action, as NEPA Compliance Officer (authorized under DOE Policy 451.1), I have made the following determination:

#### CX, EA, EIS APPENDIX AND NUMBER:

Description:

A9 Information gathering, analysis, and dissemination

B3.6 Small-scale research and development, laboratory operations, and pilot projects Information gathering (including, but not limited to, literature surveys, inventories, site visits, and audits), data analysis (including, but not limited to, computer modeling), document preparation (including, but not limited to, conceptual design, feasibility studies, and analytical energy supply and demand studies), and information dissemination (including, but not limited to, document publication and distribution, and classroom training and informational programs), but not including site characterization or environmental monitoring. (See also B3.1 of appendix B to this subpart.)

Siting, construction, modification, operation, and decommissioning of facilities for smallscale research and development projects; conventional laboratory operations (such as preparation of chemical standards and sample analysis); and small-scale pilot projects (generally less than 2 years) frequently conducted to verify a concept before demonstration actions, provided that construction or modification would be within or contiguous to a previously disturbed or developed area (where active utilities and currently used roads are readily accessible). Not included in this category are demonstration actions, meaning actions that are undertaken at a scale to show whether a technology would be viable on a larger scale and suitable for commercial deployment.

## Rationale for determination:

The U.S. Department of Energy (DOE) is proposing to provide federal funding to Case Western Reserve University (CWRU) for the design, development, and demonstration of an electrochemical process for iron metal production. Project activities are divided into three budget periods (BP) with a Go/No Go Decision Point between the BPs. This NEPA Determination is applicable to all BPs.

The proposed project activities include the design and construction of a lab-scale reactor for iron electrowinning using an optimized chlorine based molten salt electrolyte. Experimental research activities such as the construction of the reactor and production of iron would occur at research facilities on the campus of CWRU in Cleveland, Ohio. Samples of iron would be sent to Lawrence Livermore National Laboratory in Livermore, CA for materials characterization. Techno-economic analysis and life-cycle assessment would be completed at the University of Arizona in Tucson, AZ.

Project activities would occur within existing facilities/laboratories designed for the types of activities proposed using existing equipment; therefore, no modifications, new permits, additional licenses and/or authorizations would be necessary. No ground disturbing activities, no changes in the operation of existing facilities, and no installation of equipment outdoors would occur for project activities. The project would involve the use and handling of various corrosive and metallic materials. All such handling would occur in laboratories with dedicated material handling and disposal practices. All materials and wastes would be managed in accordance with federal, state, and local environmental regulations. Existing Environmental Health & Safety policies and procedures would be followed, including employee training, proper PPE, engineering controls, monitoring, and routine assessments. Additional policies and procedures would be implemented as necessary if new health and safety risks are identified to help ensure compliance with applicable health and safety regulations and minimize health and safety risks to employees and the public. DOE does not anticipate any impacts to resources of concern due to the proposed activities of the project.

### NEPA PROVISION

DOE has made a final NEPA determination.

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Industrial Efficiency and Decarbonization Office

#### FOR CATEGORICAL EXCLUSION DETERMINATIONS

The proposed action (or the part of the proposal defined in the Rationale above) fits within a class of actions that is listed in Appendix A or B to 10 CFR Part 1021, Subpart D. To fit within the classes of actions listed in 10 CFR Part 1021, Subpart D, Appendix B, a proposal must be one that would not: (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE or Executive Orders; (2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators), but the proposal may include categorically excluded waste storage, disposal, recovery, or treatment actions or facilities; (3) disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases; (4) have the potential to cause significant impacts on environmentally sensitive resources, including, but not limited to, those listed in paragraph B(4) of 10 CFR Part 1021, Subpart D, Appendix B; (5) involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species, unless the proposed activity would be contained or confined in a manner designed and operated to prevent unauthorized release into the environment and conducted in accordance with applicable requirements, such as those listed in paragraph B(5) of 10 CFR Part 1021, Subpart D, Appendix B.

There are no extraordinary circumstances related to the proposed action that may affect the significance of the environmental effects of the proposal.

The proposed action has not been segmented to meet the definition of a categorical exclusion. This proposal is not connected to other actions with potentially significant impacts (40 CFR 1508.25(a)(1)), is not related to other actions with individually insignificant but cumulatively significant impacts (40 CFR 1508.27(b)(7)), and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211 concerning limitations on actions during preparation of an environmental impact statement.

The proposed action is categorically excluded from further NEPA review.

SIGNATURE OF THIS MEMORANDUM CONSTITUTES A RECORD OF THIS DECISION.

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